

**UNITED STATES DISTRICT COURT**  
for the  
**Eastern District of Pennsylvania**

United States of America	)	
v.	)	
Tyheem Tyler	)	Case No. 23-mj-706
	)	
	)	
	)	
	)	

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*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 12, 2021 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 922(g)(1) Possession of a firearm and ammunition by a convicted felon.

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

/s/ William Schlosser

*Complainant's signature*

William Schlosser, TFO FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 4/4/23

/s/ Scott W. Reid

*Judge's signature*

City and state: Philadelphia, Pennsylvania

Hon. Scott W. Reid, US Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND WARRANT**

I, William Schlosser, Task Force Officer, Federal Bureau of Investigation (“FBI”), Philadelphia, Pennsylvania, being duly sworn, state:

1. I am an “investigative or law enforcement officer” as defined in 18 U.S.C. § 3051, as such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

2. I am a Task Force Officer (“TFO”) with the Federal Bureau of Investigation (“FBI”), Philadelphia Field Division and have been assigned to the FBI since February 2017. I have received specialized training from the FBI, including training in the investigation and identification of narcotics traffickers and violent gangs. During my tenure with the FBI, I have been assigned to the High Intensity Drug Trafficking Area (“HIDTA”)/Safe Streets Violent Drug Gang Task Force (“SSVDGTF”) of the Philadelphia Division, which investigates, among other violations of federal law, violent drug gangs and criminal organizations including those involved in the importation, distribution and manufacturing of controlled substances, Hobbs Act violations, outlaw motorcycle gangs, and homicides and shootings resulting from the drug trade. I am a police officer/detective with the Philadelphia Police Department and have been employed as such since April 2000. During my tenure with the Philadelphia Police Department, I received specialized training in narcotics enforcement. I have received specialized training from the Pennsylvania State Police (wiretap certification), ATF and the Philadelphia Police Department. As an Officer, I have investigated numerous firearms violations, drug violations, and other related crimes. I have conducted physical and electronic surveillance, debriefed confidential sources, analyzed information obtained from court-authorized pen register and trap and trace

intercepts, and participated in the drafting and execution of search warrants involving these matters. I am an active investigator for the FBI Gangs and Criminal Enterprise Program in which state and local arrests for drugs and firearms violations are reviewed and referred for possible federal prosecution. I have specialized training and experience in drug smuggling and distribution investigations, including but not limited to, the means and methods used by traffickers to import and distribute drugs, interdiction, smuggling methods, and the concealment and laundering of proceeds from illicit drug trafficking activities.

3. I have participated in numerous drug investigations, debriefed or participated in debriefings of numerous defendants, informants and witnesses who had personal knowledge regarding major drug trafficking organizations, and have participated in all aspects of drug investigations including conducting surveillance, analyzing information obtained from court-ordered pen register and trap and trace intercepts, and analyzing telephone toll information obtained as a result of subpoenas issued by the FBI.

4. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation, from discussions with other special agents of FBI and other law enforcement. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another FBI special agent or law enforcement officer who may have had either direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have read and reviewed. Such statements are among many statements made by others and are stated in substance and in part unless otherwise indicated. Since this affidavit is being submitted for the limited purpose of establishing probable cause that the offense below was committed, I have not included details of every aspect of the investigation. Facts not set forth herein are not being

relied on in reaching my conclusion that the requested order should be issued. Nor do I request that this Court rely on any facts not set forth herein in reviewing this application.

5. Based on the facts set forth in this affidavit, there is probable cause to believe that Tyheem TYLER committed a violation of Title 18 United States Code § 922(g) on or about March 12, 2021. Because this affidavit is submitted for the limited purpose of establishing probable cause for an arrest for Tyheem TYLER, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for TYLER's arrest.

6. Since January of 2020, FBI Philadelphia, in conjunction with the Philadelphia Police Department ("PPD") has been investigating the violent street gang known as the Crown Royal Gang ("CRG"). CRG is responsible for high level narcotics trafficking and violence primarily within the Frankford section of the City of Philadelphia. Intelligence gathered from the PPD has indicated that since 2018, there have been approximately 32 shootings and five homicides in the area surrounding CRG's narcotics distribution. While it is unclear how many of these acts of violence are directly associated with CRG, it is alleged the violence is in furtherance of CRG's narcotics and firearms trafficking. Agents and officers have conducted numerous controlled narcotics purchase operations from CRG members, or subjects believed to be supplied by CRG members and associates, as well as conducted numerous surveillance operations of suspected narcotics transactions.

7. In October of 2020, investigators began conducting surveillance operations pertaining to the CRG in the vicinity of the Oxford Village Housing Project (6150 Algon Avenue). More specifically, investigators targeted a yellow Ford E250 van (bearing Pennsylvania registration ZRA1465) which was parked on the 1000 block of Benner Street,

within the Oxford Village Housing Project. An NCIC check of the Ford's registration revealed it was registered to JAMES WATTS, 160 Chadwick Avenue, Marcus Hook, PA. Throughout the entirety of this investigation, law enforcement officers have never observed this yellow Ford van move. On numerous occasions from October 2020 through March 2021, investigators observed members of CRG (including WATTS, COOKIE BUNDY a/k/a "Cook," SHAKOOR SWINTON a/k/a "Koor," and TYLER) place in or remove small items or bags to and from the yellow Ford van. Additionally, other CRG members were observed congregating in the immediate vicinity of the yellow Ford van. For example, on November 18, 2020, investigators observed a grey Chevrolet sedan arriving in the housing project and park adjacent to the yellow Ford van. Approximately one minute later, WATTS walked to the yellow Ford where he unlocked and opened the passenger side front door, removed a small white object, closed the door, and walked directly to the grey Chevrolet sedan. WATTS then briefly interacted with the operator of the grey Chevrolet before it left the area. Based upon your affiant's training and experience, he believed this was a narcotics transaction. Additionally, on November 25, 2020, investigators observed SHAKOOR SWINTON place what appeared to be a black gun case into the rear storage area of the yellow Ford van. Therefore, investigators suspected the yellow Ford van was being utilized to store narcotics and firearms.

8. On March 12, 2021, investigators observed numerous members of the Crown Royal Gang, including COOKIE BUNDY, SHAKOOR SWINTON, TYHEEM TYLER, BARRY MITCHELL, BYSIL RANDOLPH, and JAMES WATTS congregating in the immediate vicinity of the yellow Ford Van. During this time, investigators observed WATTS remove a black plastic bag from the yellow Ford van, enter a white Acura TL with the bag, and leave the area. At the direction of the FBI, uniform PPD police officers immediately began

following the vehicle and observed it had a cracked windshield and dark tint on its windows; the cracked windshield and dark window tint are both violations of the Pennsylvania Vehicle Code. The uniform PPD police officers then initiated a vehicle stop on the white Acura. WATTS was identified as the operator and sole occupant and was determined to have a suspended Pennsylvania driver's license; WATTS was then removed from the vehicle. WATTS was patted down for officer safety, and \$4,000 United States Currency ("USC") was recovered from his person. During this time, both SWINTON and TYLER were observed briefly entering and exiting the yellow Ford van and were then observed in the area of WATTS's vehicle stop. Following a positive PPD K-9 indication of narcotics, the Acura was towed to a secure FBI Philadelphia parking lot; WATTS was sent on his way. Additionally, the same PPD K-9 then conducted outside search of the yellow Ford van, where he/she had a positive indication of narcotics. Therefore, the yellow Ford was also towed to the secure FBI Philadelphia parking lot. After obtaining Commonwealth of Pennsylvania search warrants for both vehicles, law enforcement officers searched the yellow Ford van and the white Acura TL.

9. During the course of the search, the following items were located in the yellow Ford E250 van:

- Approximately 114 grams of suspected crystal methamphetamine (located beneath the front passenger seat)
- Approximately eight white 30mg oxycodone pills (located in the center cupholder)
- Approximately 310 grams of suspected crack cocaine in various forms and packaging (located in the rear storage area and the front center console lower compartment area)

- Approximately 21 grams of suspected heroin in glassine packets stamped "Dietz and Watson", "Venom", "5Nick", and "Guns & Roses" (located in the rear storage area and under the front driver seat)
- Approximately 938 grams of suspected cocaine (located in the rear storage area)
- Approximately 30 ecstasy (MDMA) pills (located in the rear storage area)
- A grinder with white residue (located in the rear storage area)
- Miscellaneous paperwork (located in the rear storage area)
- A piece of notebook paper with the illustration "Crown Royal Gang" drawn on it (located in the rear storage area)
- Approximately four digital scales (located in the rear storage area)
- Various unused packaging materials (Located in the rear storage area)
- Approximately \$755 USC in a blue Nike bag with the name "Tyheem T." written on it (located in the rear storage area)
- Approximately \$10 USC in a bag which contained packaged crack cocaine (located in the rear storage area)
- Black Glock 30 .45 caliber firearm bearing obliterated serial numbers, loaded with eight live rounds plus one in the chamber (located on the floorboard of front driver's side door)
- Black Glock 30 .45 caliber firearm bearing serial number BEVE871, loaded with 11 live rounds plus one in the chamber (located in a drawer in the rear storage area)
- Black Taurus Pt111 G2c 9mm firearm bearing serial number TJX59454, loaded with 11 live rounds plus one in the chamber (located beneath the driver's seat).

10. Following the execution of the aforementioned search warrant, the seized firearms were entered into FBI evidence and later submitted to the FBI Laboratory in Quantico, Virginia for analysis. On September 24, 2021, your affiant received a report from the FBI Laboratory which stated the mixtures of DNA obtained from each of the firearms contained male DNA suitable for comparison.

11. On September 14, 2022. United States Magistrate Judge Pamela Carlos, Eastern District of Pennsylvania, issued a search warrant for the collection of DNA samples from Tyheem TYLER. At Approximately 3:50 PM, your affiant and FBI Special Agent William Becker executed the search warrant on TYLER outside his residence located at 3011 Hallowell Court, Bensalem PA. SA Becker utilized two sterile cotton tipped swabs to swab the inside of TYLER's cheeks. At the conclusion of the warrant, SA Becker provided TYLER with a copy of the search warrant as well as a copy of the FD-597 property receipt.

12. On September 15, 2022, a request was submitted, and the swabs were sent to the FBI lab in Quantico Virginia for comparison to the firearms recovered inside the Ford F250 van on March 12, 2021.

13. On February 27, 2023, the DNA report from the FBI lab was obtained by SA Becker. According to the DNA report, the firearm recovered under the driver seat of the Ford F250 van on March 12, 2021, was listed as item 1(1). Male and female DNA were obtained from that firearm listed as 1(1). Item 1(1) refers to the Black Taurus Pt111 G2c 9mm firearm bearing serial number TJX59454, loaded with 11 live rounds plus one in the chamber recovered from the van.

14. The report concludes that "The DNA results from item 1(1) are 3.7 quadrillion times more likely if TYLER and an unknown, unrelated person are contributors than if two unknown, unrelated people are contributors."

15. TYLER has prior felony convictions including a conviction for charges related to narcotics trafficking, in March 2019, in the Commonwealth of Pennsylvania in which he was sentenced to a term of imprisonment of 2 years. As such, TYLER is prohibited from possessing a firearm and ammunition under federal law.

16. Based on my training and experience and my conversation with other members of law enforcement, I believe that the firearm and ammunition recovered in this case was manufactured outside of the Commonwealth of Pennsylvania, thus the firearm and ammunition crossed state lines, affecting interstate commerce.

17. Based on the facts and circumstances above, your affiant believes there is probable cause to support that Tyheem TYLER committed the offense of possession of a firearm and ammunition by a convicted felon, in violation of Title 18, United States Code Section 922(g)(1) on or about March 12, 2021.

/s/ William Schlosser

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William Schlosser  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to before me  
on April 4, 2023.

/s/ Scott W. Reid

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Honorable Scott W. Reid.  
United States Magistrate Judge